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Email: [info@mkkglaw.com](mailto:info@mkkglaw.com)**Attorneys for Plaintiff Volvo****Construction Equipment Rents, Inc.****UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**VOLVO CONSTRUCTION EQUIPMENT  
RENTS, INC.,

Case No: 2:09-cv-32

Plaintiff,

vs.

**JOINT MOTION FOR ENLARGEMENT  
OF TIME TO SUBMIT PROPOSED  
CONFIDENTIALITY/PROTECTIVE  
ORDER**NRL RENTALS, LLC, NRL TEXAS  
RENTALS, LLC, NRL SAN ANTONIO  
RENTALS, LP, NRL HIGH ACCESS, LLC,  
VEGAS RENTS, LLC, ROBERT BALLI,  
HILARY BALLI, R& H.P. BALLI FAMILY  
TRUST, NICK BALLI, LARRY CHAVEZ,  
BOSWORTH NEVADA INVESTMENTS, LLC,  
BOSWORTH FARMS, INC., DWIGHT  
BOSWORTH, MARCEL BOSWORTH,  
MARINA QUEST, INC., MARINE QUEST-  
JOE POOL, INC., MARINE QUEST-TEXOMA,  
LP, MARINE QUEST TEXOMA II, LP,  
MARINE QUEST-CAPTAINS COVE, LP,  
MARINE QUEST-EAGLE MOUNTAIN, LP,  
MARINE QUEST-ANDERSON MILL, LP,  
MARINE QUEST-MARSHALL FORD, LP,  
MARINE QUEST-HARBOR ONE, LP,  
MARINE QUEST-BOZ I, LP, MARINE  
QUEST-HIDDEN COVE LP, MARINE  
QUEST-EXECUTIVE, LP, MARINE QUEST-  
CHANDLER'S LANDING, LP, MARINE  
QUEST-LAKE COUNTRY, LP, MARINE  
QUEST-INVESTMENTS, LP, TARRANT  
COUNTY MARINA ENTERPRISES, INC.,

1 LAKE COUNTRY MARINA, INC., ELITE  
2 MARINE MANAGEMENT, LLC, JEFFERSON  
BANK, PLAINSCAPITAL BANK,

3 Defendants.  
4

5 Plaintiff and Defendants jointly move this Court for a four day enlargement of time –  
6 until August 20, 2010 – in which to submit proposed confidentiality/protective order(s), in  
7 response to the Court’s Order dated July 30, 2010 (#322). The parties have not previously  
8 sought an extension of time of the deadline contained in the subject Order.

9 The Court’s July 30, 2010 Order (#322) directed the parties to meet and confer on a  
10 proposed confidentiality agreement and protective order and to either submit a jointly proposed  
11 version, or their own separate versions, by August 16, 2010. Counsel held a conference call on  
12 August 5, 2010 which included a discussion of this subject. Defendants’ counsel is reviewing  
13 Plaintiff’s proposed version of a confidentiality/protective order and has pledged to provide  
14 comments and/or revisions very soon. However, Plaintiff’s lead counsel is currently out of the  
15 country on vacation and will not return until August 16, 2010.

16 Because the parties are working on what will hopefully be a mutually agreeable, jointly  
17 proposed version of a confidentiality order, they ask for a few additional days to submit their  
18 confidentiality agreement/protective order(s) after Plaintiff’s counsel returns from vacation so he  
19 has time to review Defendants’ comments and changes and counsel can have further discussion,  
20 if necessary. If the parties are not granted the extension of time they will each have to submit  
21 their own version and have the Court decide which document to choose.

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1 Therefore, for all the foregoing reasons, Plaintiff and Defendants jointly ask this Court to  
2 grant their motion and allow them a four day enlargement of time in which to submit proposed  
3 confidentiality/protective order(s), through and including August 20, 2010.

4 Dated this 13<sup>th</sup> day of August, 2010.

5 Respectfully submitted,

6 /s/ Jason M. Gerber  
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13 /s/ Robert W. McIntyre  
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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 8-13-10

23 /s/ Spencer M. Judd  
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**Attorneys for NRL Rentals Defendants;  
Balli Defendants; Bosworth Defendants; and  
Marine Quest Defendants**

**PROOF OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of August, 2010, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

By/s/ Jason M. Gerber, Esq.  
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Construction Equipment Rents, Inc.